

UNITED STATES DISTRICT COURT
COMMONWEALTH OF MASSACHUSETTS

THOMAS MCNIFF,
Plaintiff

v.

TOWN OF DRACUT,
Defendant

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) C.A. No. 05CV10238 WGY
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JOINT STATEMENT

Pursuant to Local Rule 16.1(D) and this Court's Notice of Scheduling Conference, the parties hereby report to the Court as follows:

I. AGENDA FOR SCHEDULING CONFERENCE

The parties suggest the following agenda of matters to be discussed at the conference:

- a. The proposed scheduling plan for discovery and motions;
- b. The positions of the parties regarding settlement;

II. COMPLIANCE WITH LOCAL RULE 16.1(D)

- A. Discovery will end on October 7, 2005;
- B. Plaintiff will disclose his expert(s) by November 7, 2005;
- C. Defendant will disclose its expert(s) by December 7, 2005;
- D. All Expert Depositions shall be completed by January 7, 2006;
- E. Dispositive Motions:

Dispositive Motions shall be filed by February 7, 2006

Responses to dispositive motions will be filed by March 7, 2006

Oral Argument on the motions will take place before April 7, 2006 or such other time as the Court deems appropriate.

F. Pretrial Conference:

The parties request a pretrial conference after a decision on the dispositive motions.

The parties suggest May 7, 2006 with trial scheduled in the weeks following.

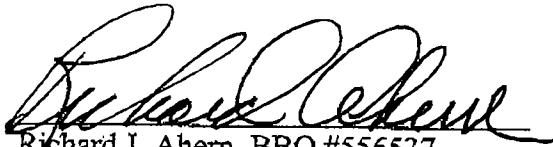
IV. CERTIFICATIONS:

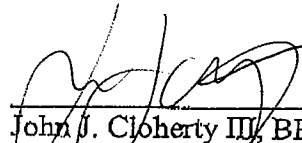
Certifications required by L.R. 16.1(D)(3) are being filed separately with the court.

Respectfully Submitted,
The Plaintiff,
THOMAS MCNIFF,
By his Attorneys,

The Defendant,
TOWN OF DRACUT,
By its Attorneys,

PIERCE, DAVIS & PERRITANO, LLP


Richard J. Ahern, BBO #556537
Attorney at Law
200 Central Street
Lowell, MA 01852
(978) 970-2989


John J. Cloherty III, BBO # 566522
Ten Winthrop Square
Boston, MA 02110
(617) 350-0950

I hereby certify that a true copy of the
above document was served upon (each
party appearing pro se and) the attorney
of record for each (other) party by ~~mail~~ *electronic filing*
(by hand) on 3/2/05
